

Christopher M. Neumeyer (CSB No. 151994)  
Asia Law Foreign Legal Affairs Law Firm  
17F, Suite B, No. 167  
Dunhua North Road  
Taipei 10549, Taiwan  
Telephone: +886-2-2717-1999  
[chrisneumeyer@asialaw.biz](mailto:chrisneumeyer@asialaw.biz)

Attorneys for Defendants  
Quanta Storage, Inc. and Quanta Storage  
America, Inc.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE OPTICAL DISK DRIVE PRODUCTS  
ANTITRUST LITIGATION

MDL Docket No. 3:10-md-02143-RS-JCS

This document relates to:

Case No. 3:13-cv-05372-RS

Ingram Micro Inc., et al.,

Plaintiffs,

**STIPULATION AND ~~PROPOSED~~  
ORDER REGARDING EXTENSION OF  
TIME TO RESPOND TO AMENDED  
COMPLAINT AND SERVICE OF  
PROCESS**

v.

LG Electronics, Inc., et al.,

Hon. Richard Seeborg

Defendants.

[Fed. R. Civ. P. 4 and Civil L.R. 6-1]

**STIPULATION**

WHEREAS on October 25, 2013, Plaintiffs Ingram Micro Inc. (“Ingram Micro”) and Synnex Corporation (“Synnex”) filed a Complaint for Damages and Injunctive Relief [Doc. No. 1] (the “Complaint”) naming Quanta Storage, Inc. (“QSI”) and Quanta Storage America, Inc. (“QSA”), among others, as defendants; and

WHEREAS on March 26, 2014, Plaintiffs Ingram Micro and Synnex and Defendants QSI and QSA signed a Stipulation and [Proposed] Order Regarding Extension of Time to Respond to Complaint and Service of Process, in which QSI and QSA agreed to waive service of a summons under Rule 4 of the Federal Rules of Civil Procedure and to waive any objections to the absence of service of a summons and the Complaint, and the parties to the stipulation agreed to extend the deadline for QSI and QSA to answer or otherwise respond to the Complaint to Tuesday, June 24, 2014, and this Court granted an Order based on that stipulation; and

WHEREAS on April 17, 2014 other defendants in this action, not including QSI and QSA (the “Other Defendants”), filed a Joint Motion to Dismiss the Complaint in this matter; and

WHEREAS on April 30, 2014, Plaintiffs Ingram Micro and Synnex and the Other Defendants signed a Stipulation and Proposed Order Continuing Hearing on Defendants’ Joint Motion to Dismiss and Extending Time to File First Amended Complaint, which states that (i) “Plaintiffs wish to amend their Complaint,” (ii) plaintiffs’ deadline to amend the Complaint shall be extended to June 16, 2014, (iii) the Other Defendants’ Joint Motion to Dismiss the Complaint shall be withdrawn, and (iv) the Other Defendants shall have forty-five (45) days from the filing of the amended complaint to file a response, and this Court granted an Order based on that stipulation;

NOW, THEREFORE, Plaintiffs Ingram Micro and Synnex and Defendants Quanta Storage, Inc., and Defendant Quanta Storage America, Inc., through their respective counsel, hereby stipulate and agree that:

1. Defendants Quanta Storage, Inc. and Quanta Storage America, Inc. shall not be required to answer or otherwise respond to the Complaint by June 24, 2014, as stated in the prior stipulation signed by QSI and QSA; and

2. In the event that Plaintiffs Ingram Micro Inc. and Synnex Corporation file an amended Complaint by June 16, 2014, Defendants Quanta Storage, Inc. and Quanta Storage America, Inc. shall have forty-five (45) days from the filing of such amended Complaint to respond thereto; and

3. In the event that Plaintiffs Ingram Micro and Synnex Corporation fail to file an amended Complaint by June 16, 2014, Defendants Quanta Storage, Inc. and Quanta Storage America, Inc. shall have forty-five (45) days from June 16, 2014 to answer or otherwise respond to the (un-amended) Complaint.

IT IS SO STIPULATED.

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Dated: June 13 , 2014

CROWELL & MORING LLP

By: /S/ Daniel A. Sasse

Daniel A. Sasse

Angela J. Yu

Attorneys for Plaintiffs

Ingram Micro Inc. and Synnex Corporation

Dated: June 13 , 2014

ASIA LAW FOREIGN LEGAL AFFAIRS LAW FIRM

By: /S/ Christopher M. Neumeyer

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**FILER ATTESTATION**

Pursuant to Rule 5-1(i)(3) of the Local Rules of Practice in Civil Proceedings Before the United States District Court for the Northern District of California, I, Christopher M. Neumeyer, hereby attest that concurrence in the filing of this document has been obtained from each of the other signatories.

Dated: June 13, 2014

ASIA LAW FOREIGN LEGAL AFFAIRS LAW FIRM

By: /S/ Christopher M. Neumeyer

Christopher M. Neumeyer

Attorneys for Defendants  
Quanta Storage, Inc. and Quanta Storage America, Inc.

**~~PROPOSED~~ ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED

DATED: 6/13/14



Honorable Richard Seeborg  
United States District Judge